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Attorneys for Defendants UBER TECHNOLOGIES, INC.  
and TRAVIS KALANICK

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

DOUGLAS O'CONNOR, et al., individually  
and on behalf of all others similarly situated,  
Plaintiffs,

v.

UBER TECHNOLOGIES, INC.,  
Defendant.

HAKAN YUCESOIY, et al., individually and  
on behalf of all others similarly situated,  
Plaintiffs,

v.

UBER TECHNOLOGIES, INC. and TRAVIS  
KALANICK,  
Defendants.

CASE NO. 13-cv-03826-EMC  
CASE NO. 15-cv-00262-EMC

**DEFENDANTS UBER TECHNOLOGIES  
INC. AND TRAVIS KALANICK'S  
STATEMENT IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
PRELIMINARY APPROVAL OF CLASS  
ACTION SETTLEMENT**

Defendants Uber Technologies, Inc. (“Uber”) and Travis Kalanick (collectively, “Defendants”) support Plaintiffs’ request for preliminary approval of the proposed class action settlement because the settlement is fair, reasonable, and adequate. Defendants also agree to provisional certification of the proposed class for settlement purposes only. While Defendants deny all of Plaintiffs’ claims in these consolidated actions, deny any and all allegations of wrongdoing, fault, liability, or damage of any kind to Plaintiffs and the class, and vigorously dispute that they have engaged in any actionable conduct, they have agreed to resolve the cases to avoid the expenses, uncertainties, delays, and other risks inherent in continued litigation. In particular, Defendants reserve all of their objections to class certification for litigation purposes, and do not consent to certification of the proposed class for any purpose other than to effectuate the settlement.

Defendants respectfully request that the Court enter the Proposed Order Granting Motion for Preliminary Approval of Settlement.

DATED: April 21, 2016

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Theodore J. Boutrous Jr.  
Theodore J. Boutrous Jr.

Attorneys for Defendants UBER TECHNOLOGIES,  
INC. and TRAVIS KALANICK

I, Kevin J. Ring-Dowell, hereby attest that concurrence in the filing of this document has been obtained from Theodore J. Boutrous, Jr.

DATED: April 21, 2016

By: /s/ Kevin J. Ring-Dowell  
Kevin J. Ring-Dowell